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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Case No.: 2:17-cr-110 APG-DJA

12 Plaintiff,

13 vs.

14 **STIPULATION TO EXTEND
15 DEADLINES; PROPOSED ORDER**

16 SYLVIANE WHITMORE,

17 LARRY MCDANIEL,

18 Defendants.

19 The parties, Sylviane Whitmore, by and through her counsel, Lisa A. Rasmussen,
20 Larry McDaniel, by and through his counsel, Daniel Hill, and the United States, by and
21 through its counsel, Assistant United States Attorney Richard Anthony Lopez, hereby
22 stipulate as follows:

23 1. Presently, the supplemental briefing on McDaniel and Whitmore's Motions
24 for New Trial are due on January 18, 2022.

25 2. Defense counsel need additional time to prepare the supplements, in part
26 because Mr. Hill has only just received the entire file from McDaniel's prior
27 counsel. Additionally, neither Ms. Rasmussen nor Mr. Hill participated in the

1 trial in this case, so there is substantial additional review that needs to be
2 completed and neither are able to complete the supplements on or before
3 January 18, 2022.
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- 5 3. Defendants propose the following extensions of time:
 - 6 a. Whitmore and McDaniel's supplement's due on February 17, 2022;
 - 7 b. Government's Response due on March 16, 2022;
 - 8 c. Whitmore and McDaniel's Replies due on March 30, 2022.
- 9 4. The government agrees to these extended dates but does not waive any rights
10 to object to any procedural infirmities nor does this stipulation confer any
11 statutory extensions upon the defendants unless the court finds cause for the
12 same, which has yet to be determined.
- 13 5. The government's forfeiture motion, ECF 232, would continue to be held in
14 abeyance and the sentencing hearings set for April 21, 2022 can later be
15 adjusted as and if needed by the parties and/or the Court.

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6. Denial of this request would cause prejudice to the Defendants Whitmore and McDaniel and this request for an extension of time is not made for the purpose of delay.

Dated this 13th day of January 2022.

The Law Offices of Kristina Wildeveld & Associates,

/s/ *Lisa A. Rasmussen*

LISA A. RASMUSSEN, ESQ.
Counsel for Sylviane Whitmore

Hill Firm,

/s/ Daniel Hill

DANIEL HILL, ESQ.
Counsel for Larry McDaniel

**CHRISTOPHER CHIOU,
Acting United States Attorney
District of Nevada**

/s/ Richard Anthony Lopez

BY: RICHARD ANTHONY LOPEZ
Assistant United States Attorney

ORDER

Pursuant to the Stipulation of the parties, and good cause appearing,

IT IS HEREBY ORDERED that the briefing schedule due on January 18, 2022 is

hereby extended as follows:

- a. Whitmore and McDaniel's supplements due on February 17, 2022;
- b. Government's Response due on March 16, 2022;
- c. Whitmore and McDaniel's Replies due on March 30, 2022.

Dated: January 19, 2022

The Honorable Andrew P. Gordon
United States District Judge